

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SANDRA KERNAGHAN,	)	
Plaintiff,	)	No. 08 C 102
	)	
vs.	)	Judge St. Eve
	)	Magistrate Judge Nolan
CITY OF CHICAGO, et al.,	)	
Defendants.	)	

**PLAINTIFF'S AGREED MOTION FOR LEAVE TO FILE *INSTANTER*  
THE ATTACHED FIRST AMENDED COMPLAINT**

Plaintiff, through counsel, Law Offices of Lawrence V. Jackowiak, respectfully requests that this Honorable Court grant her leave to file *instante* the attached First Amended Complaint. In support thereof, Plaintiff states as follows:

1. This motion is agreed.
2. This case was originally filed on January 7, 2008.
3. At the time the case was originally filed, the Plaintiff did not know the names of the Defendant-Officers.
4. Through written discovery in this case, Plaintiff's counsel has discovered the name of the Defendant-Officers.
5. The attached First Amended Complaint adds Officers MATTHEW CLINE, JOSE CARDO, DANIEL DELOPEZ, JOHN DOLAN, CRAIG DUNDERDALE, VERNON MITCHELL JR, KENNETH URBON, and SCOTT WOLFF as Defendants.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court grant her leave to file *instante* the attached First Amended Complaint.

Respectfully submitted,

/s/ Daniel P. Kiss  
*Counsel for the Plaintiff*

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